

ALB:ADW/DJL
F.# 2021R00452/OCDETF#NY-NYE-0904

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

[REDACTED]
[REDACTED]
[REDACTED]
IVAN NICIO-LORENZO,

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl)

1. In or about August 2021, within the Eastern District of New York and elsewhere, the defendants [REDACTED]

[REDACTED] IVAN NICIO-LORENZO, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of fentanyl involved in the conspiracy attributable to the

I N D I C T M E N T

Cr. No. 1:21-cr-00470(RPK)(JRC)
(T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(A)(vi), 841(b)(1)(B)(vi), 846,
853(a) and 853(p); T. 18, U.S.C., §§ 2
and 3551 et seq.)

defendants as a result of their own conduct, and the conduct of other co-conspirators reasonably foreseeable to them, was 400 grams or more of a substance containing fentanyl.

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(vi); Title 18, United States Code, Sections 3551 et seq.)

[REDACTED]

COUNT THREE

(Distribution and Possession with Intent to Distribute Fentanyl)

3. On or about August 31, 2021, within the Eastern District of New York and elsewhere, the defendant IVAN NICIO-LORENZO, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved 400 grams or more of a substance containing fentanyl, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendants charged in Counts One through Three that, upon their conviction of any of such offenses, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p),

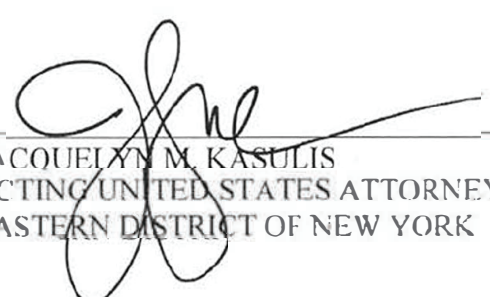
to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL



FOREPERSON



JACQUELYN M. KASULIS
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT
EASTERN *District of* NEW YORK
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

 IVAN NICIO-LORENZO

Defendants.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(A)(vi), 841(b)(1)(B)(vi), 846,
853(a) and 853(p); T. 18, U.S.C., §§ 2 and 3551 et seq.)

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Andrew D. Wang, Assistant U.S. Attorney
(718) 254-6311